

NELSON BROOKE: Hi. My name is Nelson Brooke. I'm the riverkeeper with Black Warrior Riverkeeper out of Birmingham, Alabama. I appreciate you all having this opportunity for public comment on the BLM Federal Coal Leasing Program. Black Warrior Riverkeeper is specifically focused on protecting the aquatic resources within the Black Warrior River Basin in Alabama, a basin which is the largest coal mining basin in the deep South. It has been mined for nearly two hundred years. We have, roughly, a hundred active coal mining permits for both surface and underground mines within our river basin. First, from 1990 to 2012, six federal tracts of land were leased through this deal and leasing program in Alabama, most of which took place in the Black Warrior River Basin. One of those six mines, which encompassed over 11,000 acres of lease, was the North River underground mine, which was a holding of Walter Energy, which recently went bankrupt and sold out its miners during the bankruptcy process. So, that is just to highlight how this has not necessarily been a net benefit for the state of Alabama. Talking about the most recent lease for Gnarley Mine #3 to Best Coal Company for 160 acres of surface mining, this is in a very special area within the Black Warrior Basin within the Locust Fork of the Black Warrior River subbasin. It is very bio-diverse, and this is a very special stretch of river, which we don't think was taken fully into account by the EA process. We think that the interagency review and the review of available information was flawed. Unfortunately, a finding of no significant impact was found for this lease. However, we were not able to access that as the link was down on the BLM website. The EA was inadequate because it failed to consider downstream impacts to the Locust Fork from this mine, which would drain out of Trouble Creek into an area known as critical habitat for six endangered species of mussels as well as numerous other T&E species in the Locust Fork. Alabama is number one for aquatic biodiversity in the United States. And that is, unfortunately, being overlooked by this process. There needs to be much more thorough environmental review. This mine is covered by nationwide permit 21, which was grandfathered in Alabama for forty-one mines that have significant impacts to surface waters and also wetlands to where we are very concerned about that. Likewise, we have Bankhead National Forest and the Sitsi Wilderness and the Oakmulgee District of the Talladega National Forest. We do not want to see the minerals in those beautiful public lands leased. And we also are burning metallurgical coal from the Powder River Basin as Miller Steam Plant on the Locust Fork, which is one of the largest CO<sub>2</sub>-emitting power plants in the entire nation. Please discontinue this program. It is harmful to our natural heritage, to our communities, and to the future of our health. Thank you.